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September 14, 2000

Mr. K. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

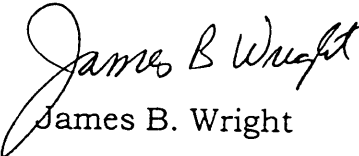
RE: Docket No. 00-00544, Generic Docket to establish UNE prices
for line sharing per FCC 99-355, and riser cable and terminating
wire as ordered in TRA docket 98-00123.

Dear Mr. Waddell:

Enclosed for filing in the above case are an original and thirteen copies of
the Responses of United Telephone-Southeast, Inc. to the September 8, 2000
data requests of the Staff.

Please contact me if you have any questions.

Sincerely,


James B. Wright

Enclosure

cc: Dennis Wagner
Laura Sykora
Kaye Odum
Steve Parrott
Lynn Greer, Pre-Hearing Officer
Parties of Record (w/enclosure)

POSTED
9-18-00

CERTIFICATE OF SERVICE
Line Sharing UNE (Docket No. 00-00544)

The undersigned hereby certifies that on September 14, 2000, the UTSE responses to Staff data request was served upon the following parties of record by placing a copy of the same in the United States Mail postage prepaid and addressed as follows:

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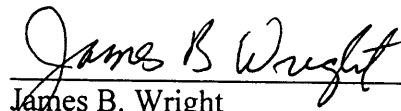
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James B. Wright

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TENNESSEE REGULATORY AUTHORITY STAFF
DATA REQUEST DATED SEPTEMBER 8, 2000
DOCKET NO. 00-00544

For each Unbundled Network Element (UNE) included in BellSouth's August 18, 2000 filing (relevant pages attached), please answer the following:

Question #1: Is the network element specifically designated for unbundling pursuant to FCC Rule §51.319? If so, please reference the relevant section(s) of the rule, if applicable. Also, indicate if the network element is a Line Sharing, Terminating Wire, or Riser Cable element.

Answer: FCC Rule §51.319 specifically lists the unbundling requirements, which an incumbent LEC (ILEC) is required to provide on a nondiscriminatory basis. In summary, an ILEC is required to provide local loop and subloop access, network interface device access, switching capability access, interoffice transmission facilities access. Additionally, signaling networks and call-related databases access, operator services and directory assistance access where the ILEC does not provide customize routing or a compatible signaling protocol, and operations support systems access are required to be provided by the ILEC.

The FCC has made it clear that these unbundling requirements are not dependent upon the deployed technology of the ILEC. At the same time, FCC Rule §51.319 lists the minimum required unbundled elements to be provided.

A local loop is defined in FCC Rule §51.319 (a) as a transmission facility between the distribution frame (or its equivalent) in an ILEC's central office and the loop demarcation point at an end-user customers premises, including any inside wire owned by the ILEC. The local loop element should include all features, functions, and capabilities of the transmission facility. These features, functions and capabilities include, but are not limited to, dark fiber, attached electronics (except those electronics used for the provision of advanced services) and line conditioning. The local loop includes, but is not limited to, DS1, DS3, fiber and other high capacity loops. The subloop is defined as any portion of the loop that is technically feasible to access at terminals in the ILEC's outside plant, including inside wiring.

United Telephone-Southeast, Inc.
Response To Tennessee Regulatory Authority Staff
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Answer to Question 1, continued

BellSouth in their August 18, 2000 filing appears to have provided not only the required loop and subloop unbundling elements, including line conditioning and collocation, but have also provided additional network elements based upon BellSouth's deployed technology. While the FCC Rule §51.319 does not require these additional offerings, it does not prevent an ILEC from offering additional unbundled network elements if it should desire.

An ILEC is required to offer access to network interface devices on an unbundled basis. BellSouth meets this requirement in their August 18, 2000 filing by offering both 2-wire and 4-wire NID unbundled elements.

As directed by FCC Rule §51.319 (d)(1) an ILEC must provide nondiscriminatory access to interoffice transmission facilities on an unbundled basis. The interoffice transmission facility network elements include dedicated transport, defined as ILEC transmission facilities, including all technically feasible capacity-related services, dark fiber transport and shared transport. The elements in BellSouth's August 18, 2000 filing meet this requirement.

As directed by FCC Rule §51.319 (e) an ILEC must provide access to signaling networks, call-related databases and service management systems on an unbundled basis. Signaling networks include, but are not limited to, signaling links and signaling transfer points. Call-related databases are defined as databases that are used by signaling networks for billing and collection, or the transmission, routing or other provision of a telecommunications service. Service management systems is defined as a computer database or system not part of the public switched network that among other things interconnects to service control points and sends that service control point information and call processing instructions as needed, and with the capability to entering and storing data regarding the processing and completing a telephone call.

BellSouth's filing appears to meet this requirement by providing elements for signaling network, databases and service management systems. Additionally, BellSouth has provided elements for the following systems: BellSouth calling name database service, BellSouth access to E911 service, and LNP query service.

UNITED TELEPHONE-SOUTHEAST, INC.
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Answer to Question 1, continued

The FCC Rule §51.319 (f) directs an ILEC to provide access to operator services and directory assistance on an unbundled basis, where the ILEC does not provide customized routing or a compatible signaling protocol. In BellSouth's filing, selective routing was offered as an unbundled element, relieving them of offering access to operator services and directory assistance on an unbundled basis.

From the BellSouth, August 18, 2000 filing it cannot be determined whether or not Terminating Wire or Riser Cable are a part of any of the listed elements. The included line splitter-data element, which is not required for FCC Rule §51.319 would be a sub-element of the line sharing element.

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TENNESSEE REGULATORY AUTHORITY STAFF
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For each Unbundled Network Element (UNE) included in BellSouth's August 18, 2000 Filing (relevant pages attached), please answer the following:

Question #2: Indicate if the UNE has been included in a cost study submitted as part of TRA Docket Number 97-01262, *In Re: Petition Of BellSouth Telecommunications Inc. To Convene A Contested Case To Establish "Permanent Prices" For Interconnection And Unbundled Network Elements.*

Answer: In the timeframe allowed, United's review indicates that all the UNE elements were likely included in the cost studies submitted in Docket 97-01262 with the exception of splitters and loop makeup.

**UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TENNESSEE REGULATORY AUTHORITY STAFF
DATA REQUEST DATED SEPTEMBER 8, 2000
DOCKET NO. 00-00544**

For each Unbundled Network Element (UNE) included in BellSouth's August 18, 2000 filing (relevant pages attached), please answer the following:

Question #3: Indicate if pricing of the UNE is an issue in any pending arbitration before the Authority to which you are a party? If so, please indicate the docket number.

Answer: United Telephone-Southeast, Inc. is not involved in any arbitration proceedings with BellSouth. An affiliate of United, Sprint Communications Company L.P., filed a Petition for Arbitration with BellSouth on August 8, 2000 (Docket No. 00-00691). Substantially all of the UNEs in the BellSouth August 18, 2000 filing in this docket are at issue in the arbitration and are interim, subject to true up. (See Exhibit B to the Petition, Issues Matrix Item No. 42 and Exhibit C to the proposed interconnection agreement)